

Lesley E. Weaver (SBN 191305)  
BLEICHMAR FONTI & AULD LLP  
555 12th Street, Suite 1600  
Oakland, CA 94607  
Tel.: (415) 445-4003  
Fax: (415) 445-4020  
lweaver@bfalaw.com

Derek W. Loeser (admitted *pro hac vice*)  
KELLER ROHRBACK L.L.P.  
1201 Third Avenue, Suite 3200  
Seattle, WA 98101  
Tel.: (206) 623-1900  
Fax: (206) 623-3384  
dloeser@kellerrohrback.com

*Plaintiffs' Co-Lead Counsel*

*Additional counsel listed on signature page*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

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IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION

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This document relates to:

ALL ACTIONS

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MDL No. 2843  
Case No. 18-md-02843-VC-JSC

**DECLARATION OF MATTHEW  
MONTGOMERY IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL**

I, Matthew Montgomery, declare and state as follows:

1. I am an attorney licensed in the State of California and admitted to the United States District Court for the Northern District of California. I am Of Counsel for the California Office of Bleichmar Fonti & Auld LLP (“BFA”), Co-Lead Counsel for Plaintiffs in In re Facebook, Inc. Consumer Privacy User Profile Litigation, Case No. 18-md-02843-VC-JSC (the “MDL”), and a member in good standing of the bar of the State of California and of this Court.

2. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them.

3. In accordance with Civil Local Rules 79-5(d)(1)(A) and (e), this declaration is made in support of Plaintiffs’ Administrative Motion to File Under Seal:

	<b>Document</b>	<b>Portions Sought to be Sealed</b>
1	Discovery Letter Regarding Defendant Facebook Inc.’s Amended Responses and Objections to Plaintiffs’ Fourth Set of Interrogatories (“Discovery Letter”)	Part of the last paragraph of the Discovery Letter.

4. Attached hereto as **Exhibit 1** is a redacted version of Plaintiffs’ Discovery Letter.

5. Attached hereto as **Exhibit 2** is an unredacted version of Plaintiffs’ Discovery Letter.

6. Plaintiffs seek to file portions of the Discovery Letter under seal because some of the information contained in the last paragraph of the Discovery Letter contains or summarizes information that Defendant Facebook has designated “Confidential” or “Highly Confidential – Attorneys Eyes’ Only” pursuant to the Stipulated Protective Order, Dkt. No. 122, entered in this action.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 22nd day of January, 2021 in Davis, California.

*/s/ Matthew Montgomery*  
Matthew Montgomery

**CERTIFICATE OF SERVICE**

I, Matthew Montgomery, hereby certify that on January 22, 2021, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record. I also caused a copy of the under seal filings to be delivered to all counsel of record via electronic mail.

/s/ *Matthew Montgomery*  
Matthew Montgomery